Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of

	)	
Joint Application by BellSouth Corporation,	)	
BellSouth Telecommunications, Inc. and	)	CC Docket No. 02-307
BellSouth Long Distance, Inc. for Authorization	)	
To Provide In-Region, InterLATA Service in	)	
The States of Florida and Tennessee	)	

COMMENTS OF MPOWER COMMUNICATIONS CORP. ON BELLSOUTH APPLICATION FOR 271 AUTHORITY

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Table of Contents

Summary

In the area of OSS, BellSouth has been particularly inadequate. Initially, BellSouth deployed the TAG system. Because of constant system changes, it took more than two years to become even minimally functional. Due to the inherent system instability of TAG for data applications, Mpower has been forced to return to manual ordering for data circuits and is in the process of having to adopt a new system entirely – and EDI interface BellSouth subsequently introduced to replace its failed TAG system.

The databases made available to CLECs by BellSouth are not accurate. Despite the requirements of the UNE Remand Order, some information is not available to CLECs at all. Mpower is also being denied access to available xDSL capable loop facilities in Florida because BellSouth requires that CLECs requesting xDSL capable loops obtain a facilities reservation number to place an order. As a result, approximately 40% of Mpower's DSL sales in BellSouth territory continue to be canceled although these same customers can obtain BellSouth ADSL services.

Mpower continues to experience problems with discriminatory ordering procedures in Florida. These include the requirement of providing multiple LSRs, the absence of business rules for partial transfers, which results in unwarranted expense and delays, and BellSouth's inability to reserve facilities for CLECs so that the CLEC can guarantee facilities to its customers.

Further, although BellSouth finally instituted an automated frame due time process that is intended to permit CLECs to obtain an automated transfer of a customer's service within a specific time frame, BellSouth's process is unsatisfactory and compares unfavorably with the process of other RBOCs.

RBOCs are also required to provide CLECs with complete, accurate, timely and auditable bills. While the exact nature of the errors has evolved somewhat over time, BellSouth wholesale bills continue to be inaccurate for months at a time, thus also failing to provide timely billings.

BellSouth has made a practice of filing certain "promotional" tariffs, with very slight variations, such that they follow one another with no gap in coverage. Continuous "promotions" which consist of 10-25% discounts off retail only in areas where CLECs are trying to compete can hardly have any other intent than to snuff out competition and should be prohibited.

In order to determine whether BellSouth provides CLECs with parity of access to network elements, there must be adequate measuring and reporting of performance. All ILECs with which Mpower does business -- except BellSouth -- report performance in a way that is clearly measured against the benchmarks mandated by the respective state commission. That is not true for BellSouth.

Mpower believes BellSouth's performance is still highly discriminatory and is inadequate to allow for the granting of 271 authority. To a far greater extent than any other RBOC or ILEC with which Mpower deals, BellSouth treats CLECs in the most discriminatory manner compared to its own operations.

Mpower has seen measurable backsliding in other ILECs and RBOCs it has worked with and has a significant concern that no 271 authority be granted without the institution of clearly defined, self-administering anti-backsliding measures.

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COMMENTS OF
MPOWER COMMUNICATIONS CORP.
ON BELLSOUTH APPLICATION
FOR 271 AUTHORITY

Mpower Communications Corp. ("Mpower") hereby submits its Comments on the issues raised before the Federal Communications Commission ("Commission" or "FCC") by the BellSouth Application of September 20, 2002, for 271 authority.

I. Introduction

Mpower has commented in previous BellSouth filings for 271 authority. Unfortunately, many of those comments are still valid. In these Comments, Mpower will provide current information on the state of BellSouth's performance or lack of performance with Mpower on the 271 Checklist requirements included in 47 USC 271(c)(2)(B).

II. OSS Issues – TAG Ordering System is Ineffective – Checklist Item II

Checklist Item 2 requires a Regional Bell Operating Company ("RBOC") to provide non-discriminatory access to network elements. Mpower has not found this to be true.

In the area of Operation Support Systems ("OSS"), BellSouth has been particularly inadequate. Initially, for competitive local exchange carrier ("CLEC") access to BellSouth OSS, BellSouth deployed the TAG system. The TAG system has undergone nearly constant change from the time of its intended implementation because of the unending number of errors and problems with the system. Because of the constant changes, it took more than two years to become even minimally functional. Mpower finally was able to use TAG to some extent in January of 2001. At about that time, Mpower was informed that that version of TAG was for data only. After undergoing yet another change or "upgrade," Mpower was able to use TAG for voice in May of 2001.

Mpower continues to use TAG for voice but a system deficiency requires Mpower to submit the more expensive manual orders under certain circumstances in order to obtain a standard due date. There is a similar issue with address validations, especially for new addresses or new suite numbers, that causes them to be rejected by TAG. Thus, the only way to order service for a location with a new service address is to submit a manual order.

TAG for data orders, however, is not even minimally functional. After attempting to use TAG for data orders for approximately six months, in July of 2001, Mpower was forced to revert to manual ordering for data circuits. BellSouth has never been able to adequately identify and resolve the underlying problems. The connection would frequently be lost for a period of time. Data sent during that period would not be received. Since the system would appear to be working and Mpower would receive no notice of any kind that connectivity had been lost, it would not be aware that data had been lost.

Due to the inherent system instability, Mpower was forced to return to manual ordering for data circuits. This, of course, is not only much more time consuming and prone to errors but is much more costly as well. It was, however, the only means by which Mpower could know the order was sent and received and know that a response was sent and received. Data circuits constitute a substantial portion of Mpower's services so this causes a fundamental disruption to its business.

The version of TAG that Mpower received from BellSouth is so totally inadequate that after more than three years of concerted effort and expense to make the product work, Mpower is in the process of having to adopt a new system entirely -- an EDI interface which BellSouth subsequently introduced to replace its failed TAG system. Based upon Mpower's prior experience in interconnecting with BellSouth's OSS, Mpower is far from certain that the new system will perform as promised.

Mpower interconnects with all major ILECs in 28 markets throughout the country. Despite some initial difficulties with other ILEC systems, no other system has been even remotely as great a problem as BellSouth's. For example, Mpower began working with BellSouth in late 1998 on connecting to its OSS system and the system was not functional at all until early 2001. Mpower began working on interconnecting to Ameritech's OSS for provisioning after it first began working with BellSouth and Mpower has been satisfactorily interconnected with Ameritech's OSS since some time in

2000. BellSouth simply has not provided non-discriminatory access to its OSS, as required by 47 USC 271(c)(2)(B)(ii).

III. Inaccuracies of BellSouth Databases Lead to Loss of Customers, Delay and High Costs for CLECs – Checklist Item II

The databases made available to CLECs by BellSouth are not accurate. The databases include information on loop make-up, customer information and facilities availability. Some information is available through a CLEC-accessible database known as LENS. Despite the requirements of the UNE Remand Order,[1] other information is not available to the CLEC at all, such as type and availability of facilities at the customer premises. Even the information which is available cannot be depended upon to be accurate. As a result, Mpower is forced to use more costly and time consuming ordering procedures and processes that put Mpower at a competitive disadvantage.

The inaccuracy of BellSouth's database with regard to loop make-up and facilities availability, for example, has significantly hampered Mpower's plans to provide customers with more robust and competitive high-speed data access. Mpower's provisioning success rate with other RBOCs is far higher than with BellSouth.

Mpower has also encountered problems in transferring customers who have unreported codes on their lines. Typically, the coding on the line indicates that the customer has ADSL service, although they do not.

BellSouth requires that the order be submitted, clarified and then resubmitted. This leads to the due date being pushed out at least 72 hours. As many as 25% of all

[1] In the Matter of Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, Third Report and Order ("UNE Remand Order"), Rel. 11/5/99, Para. 427-430.

orders are delayed in this manner. Such time consuming procedures are both unnecessary and discriminatory.

IV. FRN Requirement Leads to Discriminatory Service Offerings – Checklist Item II

Mpower is also being denied access to available xDSL capable loop facilities in Florida because BellSouth requires that CLECs requesting xDSL capable loops obtain a Facilities Reservation Number ("FRN") to place an order. The FRN is derived from LENS, the OSS system BellSouth uses for this purpose. If LENS shows that facilities are not available, it will not generate an FRN. Without a FRN, a xDSL loop order cannot be placed and Mpower cannot provide service to its high-speed data customer.

Since January 2002, BellSouth's LENS system provided information to Mpower that hundreds of UNE loops were not available due to a lack of facilities. As a result, approximately 40% of Mpower's DSL sales in the BellSouth territory continue to be canceled although these same customers can obtain BellSouth ADSL services.

The LENS database has proven to be both inaccurate and unreliable. As a result, Mpower typically orders service and escalates any determination that there is a lack of facilities. Through this costly, labor intensive process, between January 2002 and August 2002, Mpower was able to obtain 240 loops when the LENS system had shown "no facilities available."

Despite multiple attempts to resolve this issue with BellSouth, BellSouth has refused to change its procedure. Further, BellSouth has not offered Mpower any viable alternative to the FRN process so that Mpower could obtain the UNEs it needs to serve its customers. Instead, BellSouth has suggested that Mpower could resell BellSouth's

ADSL. Mpower is a facilities-based carrier. It does not do resale and it does not offer ADSL. (It offers SDSL.) Further, pursuant to Para. 428 of the UNE Remand Order, ILECs should not be able to discriminate against other xDSL technologies in favor of its own xDSL technology. Nevertheless, BellSouth continues to provide xDSL services to CLECs only on a discriminatory basis.

V. Discriminatory Ordering Procedures – Checklist Item II

Mpower continues to experience problems with customer service records ("CSRs"). A CLEC needs an integrated processing system that enables it to experience the same seamless ordering process that the incumbent's retail division possesses. BellSouth, however, requires a CLEC to use multiple local service requests ("LSRs") and CSRs for orders and accounts that BellSouth's retail division has on a single account and one bill. When the CLEC tries to order by submitting a single LSR, the order is rejected. CLECs should not be required to submit multiple LSRs and face the coordination problems that generates, particularly when BellSouth places those lines on a single account and one bill.

Also due to LSR limitations, the CLEC's customer often is required to call BellSouth to request that the order be consolidated. BellSouth's retail division has a history of not responding to these requests, thereby necessitating repeated calls by the CLEC's customer. Mpower cannot process the port request until the consolidation occurs, and this process can take weeks.

BellSouth also fails to offer at parity a process for "partial transfers" of service. An example of "partial transfer" is when a CLEC customer has five lines, and wishes to leave four at its present address, but move one to a new address. If the customer is a

BellSouth customer, BellSouth processes this transfer under one order. CLECs, however, are required to submit multiple LSRs to do the transfer. The requirement of multiple LSRs forces CLECs to incur extra service order charges, and to accede to extended due dates.

Further, BellSouth has established no business rule on partial transfers. As a result, each BellSouth representative Mpower contacts suggests a different process. Therefore, no matter which process Mpower uses, it results in multiple clarifications, missed due dates and customer dissatisfaction. A consistent, non-discriminatory process needs to be established.

Further complicating such issues are the inefficient policies and procedures governing calls into BellSouth's ordering center, the Local Carrier Service Center ("LCSC"). There is only one number to call. If the representative who answers the call cannot help with a problem, the representative is not allowed to escalate the issue by transferring the call to a manager. They are instructed that a manager will call the CLEC. Even if a manager returns the call, however, if the CLEC representative is not at his/her desk, the message directs the CLEC to call into the main number again! Upon calling the main number, the CLEC will not be transferred to the manager or even to the first representative but must talk to a new person and essentially, start the process over again. This is inefficient and it causes substantial delay in the porting of customers to the CLEC. BellSouth's retail operations face no such obstacles.

Another parity problem concerning ordering is due to the inaccuracy of BellSouth's records. In order to assure the customer will have service at their "new" location, Mpower is forced to use the costly process of ordering new loops and having them installed before the customer moves in. This is required because BellSouth cannot reserve facilities for CLECs and cannot provide accurate facilities information to CLECs before the day of cutover. Therefore, to guarantee the customer will have facilities when they move in, Mpower must order new loops and have them installed prior to the customer's move-in date.

Should Mpower be notified that facilities are not available, Mpower must then ask its customer to request that BellSouth give them service, as BellSouth is able to provide retail service by means which are not available to CLECs for wholesale provisioning. The result is that CLEC customers are left with the impression that CLECs offer inferior service because CLECs cannot obtain accurate information beforehand and must frequently require the customer to spend additional monies due to the inadequacies of BellSouth's databases.

VI. Failure to Provide Adequate Frame Due Times – Checklist Item II

An automated Frame Due Time ("FDT") is a process that permits a CLEC to request of the ILEC a date and time that an automated transfer of a customer's service from the ILEC to the CLEC will occur. This process enables the CLEC to test whether or not the customer's service was transferred on time and without trouble, or to work to restore service where the service is transferred with trouble.

Although BellSouth finally instituted an FDT process, it is unsatisfactory and compares unfavorably with the processes of other RBOCs, such as SBC and Verizon. SBC and Verizon make a commitment to perform a transfer of service within a time frame of 60 or 90 minutes, respectively, before or after a specified time. BellSouth, on the other hand, will only specify a business day on which the automated transfer will occur. This eliminates the efficiencies of automated transfers.

Thus, under current BellSouth practices, Mpower only knows that some time during the day, the loop will be transferred. This involves a significant possibility that the customer will be without service for several hours or more if the transfer fails. This is a particular problem for Mpower customers at new locations who may be unwilling or unable to spend an entire day waiting for the BellSouth representative to appear.

The current "automated" BellSouth system does not provide for even a four hour interval for conversion. The only way to order such an interval is manually. What is needed is an electronic ordering procedure for new loops which allows a CLEC to order installation within a four hour period -- or shorter period, as is the case with other ILECs.

There is a risk of outages inherent in not knowing within some reasonable time frame when transfers will take place. The only available alternative is ordering "hot cuts" at a significant cost. Both alternatives represent substantial barriers to competitive entry in the BellSouth region.

SBC has acknowledged that it is not fair to impose a separate charge for coordination when an automated FDT is not available.[2] BellSouth's failure to provide an adequate FDT process violates BellSouth's obligation to provide nondiscriminatory access to OSS and to unbundled loops. BellSouth should be required to provide an adequate automated FDT process, or at least, not separately charge for coordination of "hot cuts."

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[2] Testimony of John Stankey, President of Wholesale Services, before the California Public Utilities Commission in *Order Instituting Rulemaking on the Commission's Own Motion into Competition for Local Exchange Service,* R.95-04-043/I.95-04-044, April 5, 2001, p. 12602.

VII. Failure to Provide Accurate Wholesale Bills – Checklist Item II

Pursuant to Item 2 on the 271 Checklist, RBOCs are also required to provide CLECs with complete, accurate, timely and auditable bills. While the exact nature of the errors has evolved somewhat over time, BellSouth wholesale bills continue to be inaccurate for months at a time, thus also failing to provide timely billings.

BellSouth continues to bill Mpower for many months after Mpower has submitted disconnect orders to BellSouth. This results in having to dispute the same inaccuracy on bill after bill. It adds to the difficulty of auditing bills, as well as adding to the number of disputes which must be filed and tracked. This increases not only the required time to review bills but also increases the amount of time which must be spent on the dispute resolution process.

In addition, BellSouth continues to be unable to track the bill disputes and consequently, continues to show the charges as due and owing. This frequently leads to letters threatening to cease providing new loops to Mpower because it erroneously appears to BellSouth that Mpower has not paid undisputed charges. Needless to say, since Mpower must obtain new loops in a timely fashion to provision its customers, such threats require that Mpower take additional time to resolve those BellSouth errors so that it can continue to buy loops.

Periodically, because of its billing system deficiencies, BellSouth back bills for many months of some item, such as directory services or manual billing charges. Not only does some large, new charge suddenly appear on the bill but the charges are seldom identified and supported in a manner that even allows for adequate auditing.

Consequently, Mpower must dispute the charges to determine what they include, why they have been billed, etc.

Because of BellSouth's defective wholesale billing system, Mpower must spend enormous amounts of time on billing disputes with BellSouth. Mpower believes that BellSouth falls far short of providing accurate and timely wholesale bills and thus, fails to meet the requirements of 47 USC 271(c)(2)(B)(ii).

VIII. Continuing "Key Customer" Promotions are Discriminatory – Checklist Item II

BellSouth has made a practice of filing certain "promotional" tariffs, with very slight variations, such that they follow one another with <u>no</u> gap in coverage. BellSouth has been filing such a "Key Customer" tariff since the middle of last year.

These "promotional" tariffs provide for discounts of 10-25% off the customer's total monthly bill, depending upon the length of contract entered, and are available to small business customers in selected wire centers. Those wire centers are selected based upon the amount of CLEC activity, so-called "hot wire centers." Thus, BellSouth customers, in general, are <u>not</u> provided these discounts. Captive customers, who have no competitive alternatives, are not offered these discounts. The discounts are limited to customers who have a competitive alternative. This is clearly discriminatory.

Continuous "promotions" which consist of 10-25% discounts off retail only in areas where CLECs are trying to compete can hardly have any other intent than to snuff out competition. In fact, resellers complain that such discounts make BellSouth's retail prices lower than a reseller's wholesale charges from the ILEC. Facilities-based carriers cannot compete with BellSouth when BellSouth discounts its retail services below the

CLECs' costs. These "promotions" have severely damaged the market for telecommunications services in Florida.

Further, continuous "promotions" are not really promotions but are permanent or semi-permanent discounts below tariffed rates. Tariffed rates are intended to cover costs and allow for a profit. Non-promotional, semi-permanent, below tariff rates which target CLEC customers are anti-competitive and should be prohibited.

IX. Inadequate Reporting of Performance Measures – Checklist Item II

In order to determine whether or not BellSouth provides CLECs with parity of access to network elements, there must be adequate measuring and reporting of performance. Other ILECs such as Sprint and GTE/Verizon and RBOCs such as SBC provide accessible, clear, comparable reporting of performance broken down by the following categories: 1) the individual CLEC, 2) Average for all CLECs taking service from the ILEC, 3) ILEC/RBOC performance to itself and 4) service to affiliates.

All other ILECs with which Mpower does business report performance in a way that is clearly measured against the benchmarks mandated by the respective state commissions. With other ILECs, it is easy to know whether the ILEC has fulfilled its obligations or not. Measurements may be viewed month-by-month by category, which shows both current performance and performance trends.

BellSouth, on the other hand, requires a CLEC to look at the PMAP website to see how BellSouth performed for the individual CLEC. That location provides no comparison to Commission mandated benchmarks. BellSouth retail performance is reported in another location and in a manner which provides no clear link to wholesale performance for unbundled network elements. To establish the performance criteria, a

CLEC must obtain the Florida PSC Order on performance measures, which is not available on BellSouth's PMAP site.

If BellSouth is not intentionally reporting performance in a manner which makes clear comparisons and tracking of performance trends nearly impossible, it certainly is reporting performance in a way which is both confusing and exceedingly cumbersome. The BellSouth system is grossly inadequate for verifying and tracking BellSouth's performance for CLECs or for itself.

To verify this conclusion, an Mpower employee called a BellSouth employee who is responsible for maintaining the reporting system and asked whether and how one could compare BellSouth performance for Mpower with BellSouth performance for itself. The BellSouth employee admitted that there was no ready or accurate means of comparing performance.

This is of particular concern when the figures reported by BellSouth do not appear to be accurate. Mpower also tracks ILEC performance and BellSouth's reported performance measures show far more effective performance than Mpower records for the same items. For example, for August, BellSouth-FL mean-time-to-repair ("MTTR") for Mpower is shown as being between 4-5 hours for 2-wire designed loops, DS-1's and DSL; for 2-wire non-designed loops, it is shown as being between 11-12 hours. Mpower's figures, on the other hand, show an MTTR for BellSouth-FL of more than 14 hours for all loops; the service affecting MTTR is more than 13 hours and the non-service affecting MTTR is more than 29 hours.

A consolidated, comparable means of reporting performance is crucial to the ability to determine whether BellSouth meets the standards for nondiscriminatory access.

Further, should BellSouth obtain 271 authority, it is necessary to establish subsequent performance so as to identify and prevent “backsliding.”

X. Need for Anti-Backsliding Measures

Mpower believes BellSouth’s performance is still highly discriminatory and is inadequate to allow for the granting of 271 authority. Mpower has seen some improvements in BellSouth’s performance in the penumbra of its 271 applications. Based on its experience over approximately five years of interconnection with BellSouth, however, it has little confidence that even the current inadequate levels of access to UNEs will continue to improve to an acceptable level should BellSouth be granted 271 authority. To a far greater extent than any other RBOC or ILEC with which Mpower deals, BellSouth treats CLECs in the most discriminatory manner compared to its own operations. The number of issues of deficient performance with BellSouth continues to be several orders of magnitude above Mpower’s experiences with other RBOCs and ILECs.

Unlike most CLECs, Mpower even supported the 271 application of PacBell in California. Thus, Mpower’s position on BellSouth’s 271 application is not just an indiscriminant position against the granting of 271 authority to all RBOCs under all circumstances. Mpower has seen measurable backsliding in other ILECs and RBOCs it has worked with and has a significant concern that no 271 authority be granted without the institution of clearly defined, self-administering anti-backsliding measures.

Given the status of BellSouth’s performance reporting, development of adequate anti-backsliding measures could be particularly challenging. One possibility might be to use national, standardized performance measures such as are being considered by the

FCC in Docket No.01-318, Performance Measurements and Standards for Unbundled Network Elements and Interconnection. Another possibility might be the institution of non-monetary "penalties," as suggested by Mpower in that docket.

The most common approach to "encouraging" good performance is "incentive" or penalty payments by RBOCs to poorly served wholesale customers. That is certainly one possibility and Mpower does not oppose such an approach as long as the "incentive" or anti-backsliding payments can be set at a level which does not result in any payments becoming merely a cost of doing business. Most RBOCs are well financed and even relatively heavy fines can have a rather small impact on the RBOC bottom line. The anti-backsliding penalty must be a "real" disincentive to prevent anti-competitive conduct.

The real objective for Mpower and other CLECs is good performance. Any remedy that strays too far from that objective is, therefore, likely to be less than effective. As a result, an alternative that Mpower favors is the establishment of various non-monetary processes and procedures aimed at "fixing" the problems recorded. This could involve a mandatory "truck roll" if certain standards are not met, better or more effective equipment where that is an issue, etc. For example:

1) If BellSouth misses a provisioning measure such as "troubles during installation" in one month, they could be required, at no charge, to dispatch a technician for loop trouble reports for the next month; or
2) Similarly, if BellSouth misses a measure relating to lack of appropriate facilities in one month, it could be required to pre-qualify or "pre-field" facilities for the next month; or

3) Another such situation is the repeated report by BellSouth of no trouble found on trouble tickets but after several dispatches, trouble is found on the BellSouth side of the network. BellSouth could be required to pay the CLEC for its expenses in such circumstances.

These are examples of effective policies that can cure backsliding rather than just fining BellSouth for non-performance. They can be triggered automatically; they are a more effective remedy; and they may be less contentious and time-consuming to agree upon and implement.

Regardless of which method is used to provide BellSouth with an incentive to perform, however, performance measures and penalties should not be made an exclusive remedy. CLECs should still have the option of filing a regulatory complaint or filing a civil suit when circumstances seem to require such a step. No standardized approach, no matter how thoughtfully or well-constructed, can always be adequate. Other remedies should also be available.

XI. Conclusions

Mpower continues to have numerous outstanding issues with BellSouth which prevent it from supporting this application. BellSouth does not meet the requirements of the statute. Consequently, BellSouth should not be granted 271 authority, at this time. Should the Commission grant such authority, it will be particularly necessary to institute significant anti-backsliding measures which have a significant impact on BellSouth, as well as being self-enforcing. Mandatory, non-monetary processes and procedures aimed at "fixing" recorded problems could operate as such anti-backsliding measures.

Respectfully submitted,

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